

EXHIBIT

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
Master File No. 1:17-cv-00916-RA-BCM
- - - - -x
In re:
GLOBAL BROKERAGE, INC.
F/K/A FXCM, INC.
Securities Litigation
- - - - -x
Virtual Zoom Deposition

December 11, 2020
9:30 a.m.

CONFIDENTIAL VIDEOTAPED VIRTUAL
DEPOSITION of CHRIS MEYER, in the
above-entitled action, held at the above
time and place, taken before Jeremy
Richman, a Shorthand Reporter and Notary
Public of the State of New York, pursuant
to the Federal Rules of Civil Procedure,
and stipulations between Counsel.

* * *

1 C. MEYER - CONFIDENTIAL

2 Q. And is this an email chain
3 between yourself and Darren Merwitz?

4 A. Yes, it is.

5 Q. And in your email you write,
6 We are having Elena Barrows from FXCM
7 help us organize tasks and do other
8 work, and I was wondering if she could
9 use your central desktop log-in, at
10 least for the time being, so she can
11 look around.

12 A. Okay.

13 Q. Who is Elena Barrows?

14 A. I believe she was someone at
15 FXCM that had done different
16 administrative tasks. I can't remember
17 why she wanted to come work with us, if
18 she was interested in trading, I don't
19 remember. I think she helped us for a
20 couple of months, a few months. But I
21 don't really remember why.

22 Q. And when you say, She helped
23 us for a couple of months, do you mean,
24 was she still employed by FXCM at that
25 time?

1 C. MEYER - CONFIDENTIAL

2 A. Yes, I believe so.

3 Q. Was she performing work for
4 EFFEX at that time?

5 A. I believe so.

6 Q. Do you know how much time,
7 for instance, how many days a week
8 Ms. Barrows spent performing work for
9 EFFEX during the months that she did?

10 A. No, I don't remember.

11 Q. Was it like, for instance, a
12 day or less a week, or full-time?

13 A. I don't remember.

14 Q. Do you recall if EFFEX
15 compensated Ms. Barrows for her time?

16 A. I don't remember.

17 Q. Do you recall if EFFEX
18 reimbursed FXCM for Ms. Barrows' time
19 spent working for EFFEX?

20 A. I don't remember.

21 Q. When you talk about the
22 central desktop log-in, what's that?

23 A. I think that was -- you know,
24 I'm not sure. I can't remember if that
25 was our system. I don't remember. It

1 C. MEYER - CONFIDENTIAL

2 past. And skipping ahead, you write,
3 We'd like to pay \$30,000 to Darren
4 Merwitz and \$20,000 to Alex Kochel.

5 A. Uh-huh.

6 Q. Do you recall if FXCM
7 actually paid FXCM for the bonuses
8 described in this email chain?

9 A. I don't recall specifically,
10 but I would be virtually certain we
11 did.

12 Q. And do you recall whether
13 EFFEX paid bonuses to these two FXCM
14 employees in previous times before the
15 instance in this January 2013 email?

16 A. I think we did.

17 Q. And was the reason that EFFEX
18 was paid bonuses to these two FXCM
19 employees the work that Mr. Merwitz and
20 Mr. Kochel performed for EFFEX while
21 they were employed by FXCM?

22 A. That's correct.

23 Q. Do you remember what time
24 period -- let's start with Mr. Merwitz.
25 Do you remember what time period

CERTIFICATION

I, JEREMY RICHMAN, a Notary Public for
and within the State of New York, do
hereby certify:

That the witness whose testimony as
herein set forth, was duly sworn by me;
and that the within transcript is a true
record of the testimony given by said
witness.

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I am
in no way interested in the outcome of
this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 29th day of December,
2020.


<%16780, Signature%>

JEREMY RICHMAN

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